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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

N. 4601 Monroe, Suite 202 • Spokane, Washington 99205-1295 • (509) 456-2926

March 31, 1994

CERTIFIED MAIL

P 082 933 350

Ms. Nancy Bishop
Western Farm Service, Inc.
P.O. Box 1168
3705 Beechwood Avenue
Fresno, CA 93715

Dear Ms. Bishop:

Re: Western Farm Service Walla Walla Facility
State/EPA ID No. WAD 020235420
Request for RCRA *Final Status* (Part B) TSD Permit Application

On November 18, 1980, Western Farm Service (WFS) submitted a Resource Conservation and Recovery Act (RCRA) Part A application to the U.S. Environmental Protection Agency (EPA) for a federal permit to treat and store dangerous wastes at the WFS facility in Walla Walla, Washington. On February 12, 1982, WFS sent a letter to the EPA stating that because dangerous wastes would not be treated and would not be stored for more than ninety days at the Walla Walla facility, WFS wished to withdraw the Part A. On August 25, 1982 EPA responded with a letter stating that the Part A would not be withdrawn until "...any surface impoundments, waste piles, and other facilities used to treat, store, or dispose hazardous wastes, are closed in accordance with 40 CFR Part 265 Closure Requirements." In 1989, WFS initiated site characterization studies at the facility, with the goal of terminating RCRA *interim status* as a dangerous waste treatment, storage, and disposal (TSD) facility.

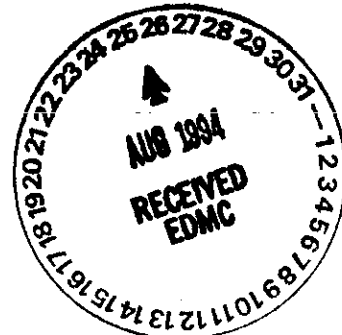
In July, 1991, Ecology and Environment, Inc., under contract to EPA, conducted a RCRA Facility Assessment (RFA) at the WFS Walla Walla facility. The purpose of the RFA was to gather data concerning past and present waste management practices, as well as information regarding any historical releases of dangerous constituents to the environment. The Ecology and Environment report summarizing the results of the RFA concluded that the Walla Walla facility was no longer operating (in 1991) as a RCRA TSD facility, but dangerous wastes had been managed at the facility in the past and historical releases of dangerous constituents to the environment had occurred as a result of the operation of an unlined surface impoundment (pesticide rinsate

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collection pit).

Because WFS never submitted a RCRA Part B permit application to obtain RCRA *final status*, the Walla Walla facility is currently an *interim status* TSD facility.

Therefore, the facility must be closed in accordance with closure performance requirements for *interim status* TSD facilities, which are given in state and federal dangerous waste regulations (Chapter 173-303-400 WAC and 40 CFR Part 265).

Currently, clean closure of dangerous waste management units at *interim status* TSD facilities in Washington state requires the removal or decontamination of all contaminated environmental media to cleanup levels established in the Washington Model Toxics Control Act (MTCA) (Chapter 173-340 WAC).

Site characterization studies conducted at the WFS Walla Walla facility since 1989 have shown that soils in the former pesticide rinsate collection pit (the RCRA-regulated dangerous waste management unit at the facility) contain numerous pesticides, some of which are present in concentrations that exceed MTCA soil cleanup levels. Several pesticides have also been detected in groundwater at the Walla Walla facility. Groundwater in monitoring wells located as far as 600 feet downgradient of the contaminant source (the former pesticide rinsate collection pit), and as much as sixty feet deep, contains pesticides. The concentrations of some of these pesticides exceed MTCA groundwater cleanup levels.

Ecology believes that the excavation of contaminated soils to MTCA soil cleanup levels is both technically and economically feasible. However, it appears it is extremely unlikely that in the near future the extensive groundwater contamination at the facility can be remediated to MTCA groundwater cleanup levels. According to WAC 173-303-800 (9), owners/operators of RCRA *interim status* TSD surface impoundments, which are closed in accordance with WAC 173-303-400 by removal or decontamination of dangerous constituents, must obtain a *final status* permit for post-closure care of the facility if the concentrations of dangerous constituents remaining after closure of the surface impoundment exceed the clean closure performance standards for *final status* TSD facilities (i.e., standards in WAC 173-303-610). Therefore, in accordance with WAC 173-303-806 (2), we are formally requesting herein, that WFS submit a Part B permit application to obtain a *final status* TSD permit for the Walla Walla facility.

Ecology anticipates that the principal component of the RCRA *final status* TSD permit will be a post-closure plan for long-term groundwater monitoring and/or remediation. The post-closure plan must be prepared in accordance with WAC 173-303-610 (8), and submitted as part of the Part B permit application [WAC 173-303-806 (4)(a)(xiii)]. The approved post-closure plan will become a condition of the *final status* permit for

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the facility.

Ecology will also require WFS to submit a closure plan to address the excavation of contaminated soils in the pesticide rinsate collection pit (the RCRA-regulated dangerous waste management unit at the facility). Ecology hopes that the closure plan will be implemented before the *final status* permit is issued, because if the closure plan has not been implemented, it must also become a condition of the permit.

If any contamination is present in other solid waste management units at the facility (i.e., non-RCRA-regulated waste management units), WFS must also submit a "corrective action" plan for remediation of that contamination [WAC 173-303-646 (2)]. As with the closure plan, Ecology hopes that the corrective action plan (if required) will be implemented before the *final status* permit has been issued, because if the corrective action plan has not been implemented, it must also become a condition of the permit [WAC 173-303-646 (2)(c)].

General information requirements for all Part B permit applications are given in WAC 173-303-806 (4)(a). Specific information requirements for Part B permit applications for the post-closure care of surface impoundments are given in WAC 173-303-806 (4)(d)(vii). Because these regulations address both currently operating dangerous waste management units as well as formerly operating units, many of the requirements in section 806 will not apply to the WFS permit application.

The Part B permit application must be submitted within six months of your receipt of this letter [WAC 173-303-806 (2)]. Two copies of the application should be sent to:

Mr. Bruce Howard
Department of Ecology
Eastern Regional Office
Suite 202
4601 North Monroe
Spokane, WA 99205-1295

One additional copy of the permit application should be sent to:

Chief, RCRA Permits Section
RCRA Permits Section, HW-106
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101

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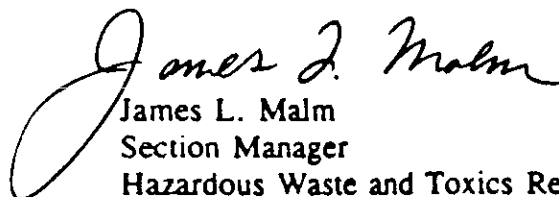
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Because of the complexity of the permit application process, we suggest that a meeting or conference call be scheduled to discuss the preparation and submittal of the Part B permit application. If you choose to retain a consultant to assist in preparation of the permit application, it would be beneficial to include the consultant in our meeting.

Finally, we would like to emphasize that we are willing to provide any assistance that you may need to facilitate the submittal of a complete and accurate permit application. If you have any questions regarding the application process, please do not hesitate to contact either Bruce Howard or Keith Stoffel at (509) 456-2926.

Sincerely,


James L. Malm
Section Manager
Hazardous Waste and Toxics Reduction Program

JLM:kt

cc: Jean Lillich, EPA
Jack Boller, EPA
John Massey, WFS

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